

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

IIG Global Trade Finance Fund Ltd. (in Official  
Liquidation), *et al.*,

Debtors.

Chapter 15  
Case No. 20-10132 (MEW)  
Jointly Administered

IIG Global Trade Finance Fund Limited (in  
Official Liquidation), IIG Structured Trade  
Finance Fund Limited (in Official Liquidation),  
Christopher Kennedy and Alexander Lawson, as  
assignees of the creditors of IIG Global Trade  
Finance Fund Limited (in Official Liquidation)  
and the creditors of IIG Structured Trade Finance  
Fund Limited (in Official Liquidation) and  
Christopher Kennedy and Alexander Lawson in  
their capacities as Joint Official Liquidators of IIG  
Global Trade Finance Fund Limited (in Official  
Liquidation), IIG Structured Trade Finance fund  
Limited (in Official Liquidation),

Plaintiffs,

Adv. Pro. No. 23-01165 (MEW)

v.

International Investment Group L.L.C., Trade  
Finance Trust, Deutsche Bank Trust Company  
Americas, Assured Investment Management, (f/k/a  
BlueMountain Capital Management, LLC),  
Tennenbaum Capital Partners, LLC, KKR Credit  
Advisors (US) LLC, Elanus Capital Management,  
LLC, BlueMountain Foinaven Master Fund L.P.,  
BlueMountain Logan Opportunities Master Fund  
L.P., BlueMountain Montenvers Master Fund  
SCA SICAV-SIF, BlueMountain Timberline Ltd.,  
BlueMountain Kicking Horse Fund L.P.,  
BlueMountain Credit Opportunities Master Fund I  
L.P., Tennenbaum Senior Loan Fund IV-B, LP,  
Tennenbaum Senior Loan Fund II, LP,  
Tennenbaum Senior Loan Operating III, LLC,  
Corporate Capital Trust, Inc., KKR Debt Investors  
II (2006) (Ireland) L.P., KKR TRS Holdings, Ltd.,  
KKR-PBPR Capital Partners L.P., Special Value  
Continuation Partners, LP, and Elanus Capital

Investments Master SP Series 1, John Doe Subsequent Transferees 1-10,000, Defendants.
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**STIPULATION AND ORDER EXTENDING TIME**

This Stipulation is entered into by and between IIG Global Trade Finance Fund Limited (in Official Liquidation), IIG Structured Trade Finance Fund Limited (in Official Liquidation), Christopher Kennedy and Alexander Lawson, as assignees of the creditors of IIG Global Trade Finance Fund Limited (in Official Liquidation) and the creditors of IIG Structured Trade Finance Fund Limited (in Official Liquidation) and Christopher Kennedy and Alexander Lawson in their capacities as Joint Official Liquidators of IIG Global Trade Finance Fund Limited (in Official Liquidation), IIG Structured Trade Finance fund Limited (in Official Liquidation) (collectively, “Plaintiffs”) and Deutsche Bank Trust Company Americas, Assured Guaranty Ltd. (on behalf of Assured Investment Management, LLC (f/k/a BlueMountain Capital Management, LLC)) and BlueMountain Foinaven Master Fund L.P., BlueMountain Logan Opportunities Master Fund L.P., BlueMountain Monteners Master Fund SCA SICAV-SIF, BlueMountain Timberline Ltd., and BlueMountain Kicking Horse Fund L.P. (collectively, the “BlueMountain Entities”), Tennenbaum Capital Partners, LLC and Tennenbaum Senior Loan Fund IV-B, LP, Tennenbaum Senior Loan Fund II, LP, Tennenbaum Senior Loan Operating III, LLC, and Special Value Continuation Partners, LP (collectively, the “Tennenbaum Entities”), KKR Credit Advisors (US) LLC and Corporate Capital Trust, Inc., KKR Debt Investors II (2006) (Ireland) L.P., KKR TRS Holdings, Ltd., and KKR-PBPR Capital Partners L.P. (collectively, the “KKR Entities”), and Elanus Capital Management, LLC and Elanus Capital Investments Master SP Series 1 (collectively, the “Elanus Entities,” and together with the BlueMountain Entities, Tennenbaum Entities, KKR Entities, and Deutsche Bank Trust Company Americas, the “Defendants,” and together with Plaintiffs, the “Parties”), by and through their respective undersigned counsel.

**WHEREAS** on August 31, 2023, Plaintiffs filed a redacted adversary complaint [Dkt. No. 1] (the “Complaint”) against the Defendants with this Court to commence the above-captioned adversary proceeding; and

**WHEREAS** the Clerk of Court issued a Summons and Notice of Pretrial Conference in an Adversary Proceeding on September 5, 2023 [Dkt. No. 5]; and

**WHEREAS** on September 6, 2023, counsel for the Plaintiffs provided counsel for the Defendants an unredacted copy of the Complaint with an “Attorneys’ Eyes Only” designation; and

**WHEREAS** in light of the other terms of this Stipulation, Defendants have agreed to authorize their counsel to accept service of the Complaint; and

**WHEREAS** under Federal Rule of Bankruptcy Procedure 9006(b), this Court may order that the period in which a party must respond to a complaint be enlarged if, as is the case here, the request is made before the expiration of the period originally prescribed; and

**NOW, THEREFORE, IT IS STIPULATED AND AGREED, AS FOLLOWS:**

1. Each of the Defendants waives any and all defenses relating to service of process.
2. Each of the Defendants shall have until and including November 6, 2023, to move to dismiss, answer or otherwise respond to the Complaint.
3. Plaintiffs shall have until and including January 12, 2024, to file and serve any response to any motion to dismiss filed by any of the Defendants.
4. Any of the Defendants that files a motion to dismiss shall have until and including February 12, 2024, to file any reply papers in support of its motion.
5. Except as otherwise expressly set forth in this Stipulation, all Parties preserve any and all of their respective rights, claims and defenses.

Respectfully submitted this 19th day of September, 2023.

/s/ Philip D. Anker

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**SO ORDERED:**

Dated: September 20, 2023  
New York, New York

/s/ Michael E. Wiles

THE HONORABLE MICHAEL E. WILES  
UNITED STATES BANKRUPTCY JUDGE